General Services Administration
Office of General Counsel
Washington, DC 20405

RECEIVED

MAY 30 1996

May 30, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Subject: Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98

Dear Mr. Caton:

Enclosed please find the original and sixteen copies of the General Services Administration/Department of Defense Reply Comments for filing in the above-referenced proceeding.

Sincerely,

Michael J. Ettner

Michael J. Ettner
Senior Assistant General Counsel
Personal Property Division

Enclosures

cc: International Transcription Service
Janice Myles (Diskette and four copies)

No. of Copies rec'd 0+16
List ABCDE

Federal Recycling Program Printed on Recycled Paper

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

RECEIVED
MAY 30 1996
FEDERAL ... OFFICE OF ...

In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996	)	CC Docket No. 96-98

REPLY COMMENTS OF THE
GENERAL SERVICES ADMINISTRATION
AND THE
UNITED STATES DEPARTMENT OF DEFENSE

ROBERT N. KITTEL
Chief, Regulatory Law Office

CECIL O. SIMPSON, JR.
General Attorney

OFFICE OF THE JUDGE ADVOCATE GENERAL
U.S. Army Litigation Center
901 N. Stuart Street, Suite 713
Arlington, Virginia 22203-1837

EMILY C. HEWITT
General Counsel

VINCENT L. CRIVELLA
Associate General Counsel
Personal Property Division

MICHAEL J. ETTNER
Senior Assistant General Counsel
Personal Property Division

GENERAL SERVICES ADMINISTRATION
18th & F Streets, N.W., Room 4002
Washington, D.C. 20405

Economic Consultant:

Snavely King Majoros O'Connor & Lee, Inc.
1220 L Street, N.W.
Washington, D.C. 20005

May 30, 1996

Table of Contents

SUMMARY

In these Reply Comments, GSA/DOD responds to the comments of 160 filing parties whose positions often sharply conflict. GSA/DOD urges the Commission to adhere wherever possible to the middle ground between the more extreme positions of these parties.

GSA/DOD supports the call by the Department of Justice and the non-incumbent LEC parties for national interconnection standards. GSA/DOD believes that all parties, including the state commissions, will benefit from such guidelines.

GSA/DOD believes the controversy over the appropriate pricing of unbundled network elements is best resolved through individual carrier negotiations. The Commission should, however, establish total service long-run incremental costs as the price floor and fully distributed costs as the price ceiling for network elements.

Finally, GSA/DOD agrees with those parties who contend that the "bill and keep" method of reciprocal compensation is appropriate for transport and termination, assuming reasonably balanced traffic. GSA/DOD recommends that the Commission adopt bill and keep as a "preferred outcome" which it would likely prescribe should a negotiation reach it for resolution.

GSA/DOD May 30, 1996

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996	)	CC Docket No. 96-98

REPLY COMMENTS OF THE GENERAL SERVICES ADMINISTRATION AND THE UNITED STATES DEPARTMENT OF DEFENSE

The General Services Administration and the United States Department of Defense ("GSA/DOD"), on behalf of the customer interests of all of the Federal Executive Agencies ("FEAs") submit these Reply Comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM"), FCC 96-182, released April 19, 1996. In this NPRM, the Commission requests comments and replies on rules to implement the local competition provisions of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 ("1996 Act"), Sections 251-3.[1]

---

[1] Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996).

I. Introduction

A total of 160 parties submitted comments on the Commission's Interconnection NPRM. These parties can generally be classified into six broad categories:

- Incumbent Local Exchange Carriers ("ILECs"),
- Interexchange Carriers ("IXCs"),
- State Public Service Commissions ("PSCs"),
- User Parties,
- Cable System Operators ("Cable Parties") and Competitive Local Exchange Carriers ("CLECs"), and
- Wireless Carriers.

While the comments filed by parties within these categories do not agree on all matters raised in the NPRM, they usually reflect a general consensus at least on the broad policy issues. Unfortunately, the consensus within one group of parties is often sharply at odds with that of other groups, so that the Commission is confronted with the unenviable prospect of having to make decisions that are certain to incur the displeasure of at least some of the participants in this proceeding.

As GSA/DOD has noted in virtually all of its pleadings, the FEAs have adopted a policy of acquiring as many telecommunications services as possible using competitive procurement procedures. Experience has demonstrated that telecommunications providers offer the lowest cost services, consistent with quality requirements, when they are obliged to anticipate competitive bids from alternative carriers.

It is therefore very much in the FEAs' interest that the Commission's rules facilitate, rather than inhibit, the rapid development of effective competition among telecommunications carriers. The Commission's rules will facilitate the development of competition only if they enjoy sufficient support among the stakeholders so as to expedite the implementation of the Telecommunications Act of 1996 ("1996 Act"). On the other hand, the Commission's rules could greatly inhibit competition if they are so abhorrent to particular interests that they invite resistance in the form of court challenges. The worst possible outcome would be a gridlock of court stays that affect not just the specific issues under contention but the entire process of implementing interconnection among telecommunications carriers.

For this reason, GSA/DOD urges the Commission to adhere wherever possible to the middle ground between the more extreme positions of the parties. This is particularly critical on issues that are likely to affect the fundamental viability of a stakeholder's position in the market or in the regulatory process.

II. Provisions of Section 251

Fortunately, not all of the 400 issues on which the Commission has sought comment are likely to affect the fundamental viability of a stakeholder's position. Even many of the areas on which there is disagreement reflect only the preferences and predilections of the parties, not necessarily their vital interests. While these issues are important and cannot be ignored, they do not threaten the implementation of the 1996 Act, which is the principal concern of GSA/DOD.

Review of the comments reveals that one section of the 1996 Act stands out as a major source of seemingly irreconcilable differences that affect the vital interests of a number of parties. That is Section 252(d), relating to pricing standards. There are broadly three areas of disagreement concerning this section. The first is the scope of the Commission's regulations, the second is the pricing standards that apply to incumbent LECs under §251(c), and the third is the pricing of interconnections among LECs pursuant to §251(b).

A. Scope of the Commission's Regulations

The vital interest that is threatened by the scope of the Commission's regulations is that of the state PSCs. Most of the PSCs submitting comments, along with the National Association of Regulatory Utility Commissioners ("NARUC") object strongly to the "detailed prescriptive overlay" of the NPRM which they regard will remove their discretion to explore varying options and employ different approaches to the policies enunciated in the 1996 Act.

NARUC accepts that the 1996 Act provides for Commission prescriptions with respect to number portability, resale, unbundled network elements, number administration and the recovery of administration costs. However, NARUC cites §152(b) of the Communications Act as assigning to the state commissions exclusive jurisdiction with respect to "...charges, classifications, practices, service, facilities or regulations for or in connection with intrastate communications service by wire or radio of any carrier..."[2] NARUC therefore does not accept that the 1996 Act authorizes the Commission to regulate pricing matters affecting intrastate services which, according to NARUC, includes interconnection among LECs. NARUC, along with several individual state commissions, argue that the traditional distinctions between interstate and intrastate rate regulation continue to apply to LEC interconnection rates and pricing.[3]

In the opposite camp are the IXCs, CLECs and Cable parties who question neither the authority nor the propriety of the Commission to prescribe detailed and specific rules governing the costing of the network elements offered for use and resale by the ILECs. AT&T, for example, offers five very specific rules covering the definition of the Total Service Long Run Incremental Costs ("TSLRIC") that should be employed to price the

---

[2] Comments of NARUC, p. 9.

[3] Id., pp. 16-20.

eleven network elements that it recommends the Commission mandate be unbundled for purchase by alternative LECs.[4] The National Cable Television Association ("NCTA") proposes that the Commission mandate a TSLRIC pricing standard based on a proxy model.[5] MFS Communications Company ("MFS") would have the Commission prescribe detailed pricing standards, leaving the state commissions with jurisdiction only to set specific prices.[6]

Finally, there is the Department of Justice ("DOJ"), which asserts, as the first of five fundamental principles, the following:

> First, the Act contemplates, and rapid, successful local entry requires national rules governing incumbent obligations to provide the basic prerequisites for entry, including clear national rules governing the scope of unbundling and interconnection requirements and the principles governing the prices at which essential services and facilities of incumbent monopolists will be provided to entrants.[7]

GSA/DOD is already on record as favoring an interpretation of the 1996 Act that does not distinguish between the interstate and intrastate aspects of interconnection service and network elements for purposes of Sections 251 and 252.[8] Indeed, GSA has

---

[4] Comments of AT&T, pp.55-61.

[5] Comments of NCTA, p.49-54.

[6] Comments of MFS, pp 49-63.

[7] Comments of DOJ, pp. 5,6.

[8] Comments of GSA/DOD, p. 6.

previously expressed the view that the present system of inflated interstate access charges cannot long endure in an environment in which LEC interconnection arrangements are based on cost and on mutual compensation.[9] Accordingly, GSA/DOD supports the call by DOJ and the non-incumbent carrier parties for national standards.

GSA/DOD is sensitive, however, to the state PSCs' concern for the apparent erosion of their jurisdiction over terms, conditions and prices of services that appear to be clearly intrastate in character. However, it is inconceivable that Congress intended to extend the traditional approach of interstate and intrastate jurisdictional separations to the field of local exchange interconnections. Under that approach, the "relative use" principles of Smith v. Illinois Bell Tel. Co.[10] would apply to interstate toll traffic moving from one LEC to another. That is, interstate calls delivered from an IXC to ILEC would then have to be transferred to a CLEC at interstate local interconnection rates. Clearly, Congress intended a new jurisdictional paradigm with respect to local exchange interconnection. Congress has written general policies that apply to all interconnection, without regard to the origin or destination of the call. In §251(d), it directed the Commission to promulgate rules implementing the terms of §251. Those rules are to be used in establishing rates for

[9] Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers, CC Docket No. 95-185, Equal Access and Interconnection Obligations Pertaining to Commercial Mobile Radio Service Providers, CC Docket No. 94-54, Notice of Proposed Rulemaking, released January 11, 1996 ("CMRS Interconnection"), Comments of GSA, March 4, 1996, p. 15.

[10] 282 U.S. 133 (1930).

unbundled network elements and by the state commission if they are called upon to arbitrate the intercarrier agreements pursuant to §252(b) of the 1996 Act. There are no "interstate" and "intrastate" local exchange interconnection rates.

GSA/DOD submits that the broader self-interest of the state PSCs should militate in favor of more detailed Commission standards and guidelines. DOJ makes a valid point that the 1996 Act's reliance on negotiations places a very high premium on preexisting legal and regulatory standards that can guide the parties in resolving disputes.[11] Otherwise, the incentive to the ILECs will be to debate, disagree and delay, hoping for a protracted arbitration before the state PSC, and if that is not successful, before the Commission itself. Absence of clear and fairly detailed standards constitutes an invitation for the ILECs to "game" a system where the status quo favors their interests.[12] Thus, in the long run, the state PSCs are probably better off under the Commission's more prescriptive approach.

Finally, GSA/DOD must refer the Commission's attention to the national security concerns expressed by the Secretary of Defense in separate Reply Comments. These concerns support a national approach to interconnection rulemaking.

---

[11] Comments of DOJ, pp.9-11.

[12] Quite possibly, this strategy explains the unanimity with which the ILECs favor only "broad guidelines" and "general principles" with respect to the Commission's interconnection rules. See, e.g., Comments of Ameritech, p.5; Bell Atlantic, p. 2; BellSouth, p. 5; Pacific Telesis, p. 7.

B. Obligations Imposed by Section 251(c) on "Incumbent LECs"

Section 251(c) relates to the pricing of unbundled network elements that the incumbent LECs must make available on a dedicated basis to competing carriers. DOJ and virtually all of the non-incumbent carrier parties favor a TSLRIC pricing standard,[13] while the incumbent LECs insist that such a standard would result in their inability to recover the common, overhead and embedded costs that they have incurred. They favor instead a fully allocated costing standard.[14]

In its initial comments, GSA/DOD proposed to resolve this anticipated dispute by recommending that the Commission establish TSLRIC as the price floor and fully distributed costs as the price ceiling for unbundled network elements. Cox Communications, Inc. ("Cox") endorses the same approach.[15]

GSA/DOD believes that the dispute between TSLRIC and fully distributed costs will prove to be more apparent than real. The difference between the two can be great when the objective is to determine the cost of a service that shares common facilities with other services. But that is not the issue here. The unbundled network elements at issue in §251(c) are to be dedicated to the use of the alternative carrier. They therefore use little common plant, and that which they do use can appropriately be apportioned as

---

[13] See, e.g., Comments of DOJ, p. 26; MCI, p. 61; Time Warner, p. 51.

[14] See, e.g., Comments of the Southern New England Telephone Company ("SNET"), pp. 29-30; Bell Atlantic, pp. 35-40; BellSouth, pp. 49-57.

[15] Comments of Cox, p. 30.

incremental in the long run to the element in question. Nor are overheads an issue if it is recognized that, over the long run, a large carrier with many network elements incurs more overhead costs than a small carrier with few network elements. Overheads, in short, are incremental.

C. Obligations Imposed on "Local Exchange Carriers" by Section 251(b)

While §251(c) obliges incumbent LECs to unbundle and offer for lease their principal network elements, §251(b) obliges all LECs to negotiate in good faith to establish reciprocal compensation arrangements for the transport and termination of traffic. The distinction is that the "transport and termination" services referenced in §251(b) use the common facilities of both ILECs and CLECs, while the network element rates in §251(c) involve the dedicated lease of facilities of the ILECs only.

Here, the standards are different. Section 252(d)(2) establishes "additional costs" as the standard, not to exclude mutual recovery mechanisms such as "bill and keep."

The ILECs abhor bill and keep. Notwithstanding that bill and keep has been explicitly approved by Congress in §252(d)(2)(A)(i) of the 1996 Act, most of the ILECs argue that it violates the terms of the Act that require compensation for costs and is therefore unlawful.[16] The most that they will say for bill and keep is that it may be acceptable if all parties agree to it. By implication, the Commission is to know that the

[16] See, e.g., Comments of Rural Telephone Coalition ("RTC"), p. 23; Cincinnati Bell Telephone Company ("CBT"), pp. 37-39; Ameritech, pp. 78-79.

ILECs will never do so.

In its Reply Comments in the CMRS Interconnection docket, GSA drew a distinction between bill and keep arrangements at the LEC's end office from those that apply from any "meet point" such as a tandem switch.[17] GSA emphasized that bill and keep from an end office is not inconsistent with the requirement for cost recovery because there is very little additional cost associated with such a termination. Most of the costs relate to the subscriber loop which is insensitive to the presence or absence of the call. In the CMRS docket, the Commission had proposed to mandate bill and keep from the end office as an interim measure. GSA supported that approach for CMRS call terminations, and it recommends it be adopted as a permanent solution for landline calling in this docket. Each carrier should be responsible for its own customer access functions.

GSA's approach to the transfer of CMRS calls at tandem switches was different. GSA acknowledged that there may be additional volume-sensitive costs associated with terminating the call, specifically the use of the tandem switch and the transport facilities to the end office. Additionally, because tandem switching may substitute for dedicated facilities to the end office, the economic tradeoff of this substitution might be distorted if the tandem switching alternative is effectively priced at zero cost.[18] For these reasons, GSA proposed that tandem switching and transport of CMRS calls be priced at the

[17] CMRS Interconnection, Reply Comments of GSA, March 25, 1996, pp. 7-11.

[18] Id., pp.9-11.

incremental cost of the activities involved.

These arguments in favor of usage pricing for tandem switching and transport are more persuasive for CMRS interconnections than for interconnection between two landline carriers. CMRS calls effectively originate at a single point, the Mobile Telephone Switching Office ("MTSO") of the CMRS carrier. On the landline end, they terminate at any point on the system. The reverse is true for calls terminating on CMRS systems; they "home" into the MTSO from points all over the landline network. Thus, in the CMRS industry, there is no symmetry between the call terminating functions of the CMRS provider and those of the landline carrier. Bill and keep for the transport function could be discriminatory against the landline carrier, particularly as many CMRS carriers impose charges on calls terminating on their systems.

Between landline carriers, however, there is symmetry at least in the functions preformed. Both carriers in a local interconnection agreement are charged with the same requirements, which are to connect the call to the serving end office and deliver it from there to the customer's premise. A presumption of matching call termination costs is at least reasonable, and for this reason, bill and keep for the entire call terminating activity is not unacceptable so long as there is an approximate balance of traffic between the carriers.

On the other hand, the hostility of the ILECs to bill and keep militates against a mandatory prescription of this approach for intercarrier settlements. Moreover, there may be particular instances such as highly unbalanced traffic, where bill and keep is not an equitable solution.

For these reasons, GSA/DOD recommends that the Commission adopt bill and keep as a "preferred outcome" which, assuming balanced traffic and a reasonable presumption of similar call termination costs, it would likely prescribe as the arbitrated solution should an unresolved negotiation reach the Commission. The carriers and the state commissions would be on notice that bill and keep is the favored arrangement, but they would not be required to adopt it if there are valid reasons to employ the alternative of explicit call termination charges.

III. Conclusion

GSA/DOD urges the Commission to issue rules to implement the interconnection provisions of the 1996 Act in the manner described in these Reply Comments.

Respectfully Submitted,

EMILY C. HEWITT
General Counsel

ROBERT N. KITTEL
Chief, Regulatory Law Office

VINCENT L. CRIVELLA
Associate General Counsel
Personal Property Division

Cecil O. Simpson, Jr. /mje
CECIL O. SIMPSON, JR.
General Attorney

Michael J. Ettner
MICHAEL J. ETTNER
Senior Assistant General Counsel
Personal Property Division

OFFICE OF THE JUDGE ADVOCATE GENERAL
U.S. Army Litigation Center
901 N. Stuart Street, Suite 713
Arlington, VA 22203-1837
(703) 696-1643

GENERAL SERVICES ADMINISTRATION
18th & F Streets, N.W., Rm 4002
Washington, D.C. 20405
(202) 501-1156

May 30, 1996

CERTIFICATE OF SERVICE

I MICHAEL J. ETTNER, do hereby certify that copies of the foregoing "Reply Comments of the General Services Administration and the United States Department of Defense" were served this 30th day of May, 1996, by hand delivery or postage paid to the following parties:

Regina M. Keeney
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, D.C. 20554

Janice Myles
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 544
Washington, D.C. 20554

International Transcription Service, Inc.
Suite 140
2100 M Street, N.W.
Washington, D.C. 20037

Paul Schwedler, Esquire
Asst. Regulatory Counsel, Telecommunications
Defense Info. Agency, Code AR
701 South Courthouse Road
Arlington, VA 22204-2199

Edith Herman
Senior Editor
Communications Daily
2115 Ward Court, N.W.
Washington, D.C. 20037

Telecommunications Reports
11th Floor, West Tower
1333 H Street, N.W.
Washington, D.C. 20005

SERVICE LIST
(CONT'D)

Richard B. Lee
Vice President
Snavely King Majoros O'Connor
& Lee, Inc.
1220 L Street, N.W., Suite 410
Washington, D.C. 20005

Charles D. Gray
National Association of Regulatory
Utility Commissioners
P.O. Box 684
Washington, D.C. 20044

Mary E. Newmeyer
Federal Affairs Advisor
Alabama Public Service Commission
P.O. Box 991
Montgomery, AL 36101-0991

Don Schröer, Chairman
Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501-1963

Christopher C. Kempley
Arizona Corporate Commission
Legal Division
1200 West Washington Street
Phoenix, AZ 85007

Thomas R. Gibbon
Bell, Boyd & Lloyd
1615 L Street, N.W.
Suite 1200
Washington, D.C. 20036

Lawrence D. Crocker, III
Attorney for Public Service Commission
of the District of Columbia
450 Fifth Street, N.W.
Washington, D.C. 20001

Cynthia B. Miller
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Weldon B. Stutzman
Idaho Public Utilities Commission
472 West Washington Street
Boise, ID 83702

William H. Smith, Jr.
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Amy E. Dougherty
Kentucky Public Service Commission
P.O. Box 615
Frankfort, KY 40602

Joel B. Shifman, Esq.
Maine Public Utilities Commission
242 State Street
State House Station 18
Augusta, ME 04333-0018

Karen Finstad Hammel, Esq.
Montana Public Service Commission
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59620-2601

SERVICE LIST
(CONT'D)

Harold Crumpton
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Maureen O. Helmer
State of New York Department
of Public Service
Three Empire State Plaza
Albany, NY 12223-1350

Maureen A. Scott
Counsel for Pennsylvania Public
Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

R. Glenn Rhyne, Manager
Research Department
State of South Carolina
Public Service Commission
P.O. Drawer 11649
Columbia, SC 29211

Mary McDermott
United States Telephone Association
1401 H Street, N.W., Suite 600
Washington, D.C. 20005

Marlin D. Ard
Pacific Telesis Group
140 New Montgomery Street
Room 1530A
San Francisco, CA 94105

Margaret E. Garber
Attorney for Pacific Telesis Group
1275 Pennsylvania Ave., N.W.
Washington, D.C. 20004

Kathryn Marie Krause
Attorney for U S West, Inc.
1020 19th Street, N.W., Suite 700
Washington, D.C. 20036

Gail L. Polivy
GTE Service Corporation
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

Richard E. Wiley
Attorney for GTE Service Corporation
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

Thomas E. Taylor
Attorney for Cincinnati Bell
Telephone Company
201 East Fifth Street
Cincinnati, OH 45202

M. Robert Sutherland
BellSouth Telecommunications, Inc.
Suite 1700
1155 Peachtree Street, N.E.
Atlanta, GA 30309-3610

Michael E. Glover
Attorney for Bell Atlantic
1320 North Court House Road
Eighth Floor
Arlington, VA 22201

Thomas P. Hester
Ameritech
30 South Wacker Drive
Chicago, IL 60606

SERVICE LIST
(CONT'D)

Antoinette Cook Bush
Skadden, Arps, Slate, Meagher
& Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005

Margot Smiley Humphrey
Koteen & Naftalin, LLP
1150 Connecticut Avenue, N.W.
Suite 1000
Washington, D.C. 20036

David Cosson
2626 Pennsylvania Avenue, N.W.
Washington, D.C. 20037

Lisa M. Zaina
21 Dupont Circle, N.W.
Suite 700
Washington, D.C. 20036

Dwight E. Zimmerman
Illinois Independent Telephone
Association
RR 13, 24B Oakmont Road
Bloomington, IL 61704

Rodney L. Joyce
Attorney for Southern New England
Telephone Company
Ginsburg, Feldman and Bress
1250 Connecticut Avenue, N.W.
Washington, D.C. 20036

Madelyn M. DeMatteo
Southern New England Telephone
Company
227 Church Street
New Haven, CT 06506

Richard M. Tettelbaum
Associate General Counsel
Citizens Utilities Company
Suite 500, 1400 16th Street, N.W.
Washington, D.C. 20036

Werner K. Hartenberger
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036

Aaron I. Fleischman
Attorney for the Time Warner
Communications Holdings, Inc.
1400 Sixteenth Street, N.W.
Washington, D.C. 20036

Paul B. Jones
Time Warner Communications
Holdings, Inc.
300 Stamford Place
Stamford, CT 06902

Robert J. Sachs
Continental Cablevision, Inc.
1320 19th Street, Suite 201
Washington, D.C. 20036

Frank W. Lloyd
Attorney for Continental Cablevision, Inc.
Mintz, Levin, Cohn, Ferris,
Glovsky & Popeo
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004

SERVICE LIST
(CONT'D)

Joseph W. Waz, Jr.
Comcast Corporation
1500 Market Street
Philadelphia, PA 19102

Howard J. Symons
Attorney for Comcast Corporation
Mintz, Levin, Cohn, Ferris,
Glovsky & Popeo
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004

Howard J. Symons
Attorney for the National Cable
Television Association, Inc.
Mintz, Levin, Cohn, Ferris,
Glovsky & Popeo
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004

Daniel L. Brenner
National Cable Television
Association, Inc.
1724 Massachusetts Avenue, N.W.
Washington, D.C. 20036

Anne K. Bingaman
U.S. Department of Justice
555 4th Street, N.W.
Room 8104
Washington, D.C. 20001

Rodney L. Joyce
Attorney for Ad Hoc Coalition of
Corporate Telecommunications
Managers
Ginsburg, Feldman and Bress
1250 Connecticut Avenue, N.W.
Washington, D.C. 20036

Wayne V. Black
Attorney for the American Petroleum
Institute
Keller and Heckman
1001 G Street, N.W.
Washington, D.C. 20001

Bradley C. Stillman, Esq.
Consumer Federation of America
1424 16th Street, N.W.
Washington, D.C. 20036

Philip L. Verveer
Willkie Farr & Gallagher
1155 - 21st Street, N.W., Suite 600
Three Lafayette Centre
Washington, D.C. 20036-3384

Michael F. Altschul
Cellular Telecommunications
Industry Association
1250 Connecticut Avenue, N.W.
Suite 200
Washington, D.C. 20036

Douglas L. Povich
Kelly & Povich, P.C.
1101 30th Street, N.W.
Washington, D.C. 20007

SERVICE LIST
(CONT'D)

Andrew D. Lipman
Attorney for MFS Communications
Company, Inc.
Swidler & Berlin, Chartered
3000 K Street, N.W. , Suite 300
Washington, D.C. 20007

David N. Porter
MFS Communications Company, Inc.
3000 K Street, N.W. , Suite 300
Washington, D.C. 20007

Richard J. Metzger
Association for Local
Telecommunications Services
1200 19th Street, N.W., Suite 560
Washington, D.C. 20036

David W. Carpenter
Attorney for AT&T Corporation
Sidley & Austin
1722 Eye Street, N.W.
Washington, D.C. 20006

Mark C. Rosenblum
Room 3245I1
295 North Maple Avenue
Basking Ridge, NJ 07920

Don Sussman
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Anthony C. Epstein
601 13th Street, N.W.
Washington, D.C. 20005

Lee M. Weiner
LCI International Telecom Corp.
8180 Greensboro Drive, Suite 800
McLean, VA 22102

Robert J. Aamoth
Attorney for LCI International Telecom
Corp.
1301 K Street, N.W.
Suite 1100 East Tower
Washington, D.C. 20005

Catherine R. Sloan
WorldCom, Inc.
d/b/a LDDS WorldCom
1120 Connecticut Avenue, N.W.
Suite 400
Washington, D.C. 20036

Peter A. Rohrbach
Hogan & Hartson L.L.P.
555 Thirteenth Street, N.W.
Washington, D.C. 20004

Charles C. Hunter
Attorney for Telecommunications
Resellers Association
Hunter & Mow, P.C.
1620 I Street, N.W., Suite 701
Washington, D.C. 20006

Charles H. Helein
Attorney for America's Carriers
Telecommunication Association
Helein & Associates, P.C.
8180 Greensboro Drive, Suite 700
McLean, VA 22102

Michael J. Ettner